

Submission on NRP Plan Change 1 – Terawhiti Farming Co Ltd

This submission is made by Terawhiti Farming Co Ltd which owns and runs a 2,681ha dry stock farm in the Terawhiti District, Makara.

We do not support the Plan Change 1 in its current form and we seek several changes. Some of the requested changes are provided at a high-level in this document and others are detailed in the submission form against specific provisions.

Please note that much of our feedback echos the feedback that several of the Makara and Ohariu community have previously provided into the Whaitua process. Unfortunately it appears that much of this work has been ignored and therefore requires repeating.

The land encompassed within the Terawhiti Farming Co Ltd property has been owned by the same family since the 1840s. No third party has a greater understanding or deeper care of the Terawhiti landscape than ourselves. Terawhiti is an integral landholding within the wider Makara community and we are proud of our relationship with the Makara and Ohariu communities. We are committed to looking after our property but all the while operating a practical and economically viable farm.

In the last five years, our small community has retired over 600 hectares of coastal or steep land and planted over 60,000 native plants in wetlands, along streams and hillsides. We have planted 3,000 poplar and willow trees along the stream to reduce streambank erosion and shade the stream. We have excluded livestock from over 3 kilometers of stream and fenced 15 kilometers of gullies or eroding coastal cliffs. Some of us have been doing this work with no council support and others have recieved advice and funding support to help us to more than we could have otherwise.

We strongly oppose the broadbrush regulatory approach taken under Plan Change 1 and the removal of local decision making from our community. We agree with the need to improve water quality – where it is poor and where the solutions are within our control – but we need some fundamental information to do this effectively and equitably. We ask council to recognise the work we have done to date and partner with us in this work rather than regulate us.

General Comments

1. **Consultation process.** We only heard about the Plan Change through community channels when a GWRC presentation in Ohariu was organised 2.5 weeks before submissions closed. We are extremely disappointed by the lack of GWRC's community engagement to consult on this Plan Change, particularly given the significant and direct impact that the proposed changes will have on us. We have identified several GWRC communication opportunities that were missed and would have helped us engage:
 - a. Direct mail contact with rural property owners, identified through council's rating database.
 - b. Formal engagement with our Community Board; and
 - c. Provision of information on the GWRC website – more accessible written information, invitation to the PC1 rural webinars/meeting.

The Plan Change document itself is difficult for most people to understand and requires more time than we have available. Accordingly, additional forms of communication are essential if GWRC really wants meaningful community feedback.

We also note that the timing of consultation falls at an incredibly busy time – both in the farm calendar and just before Christmas. Just a coincidence?...

2. **Cost implications.** The cost of implementing the proposed changes on farms will be very high and will significantly impact farm viability. Unlike the PC1 changes that impact urban areas, the financial implications fall directly to individual landowners in rural communities. The Plan Change does not give us the flexibility to stage work, unlike three waters work where many costs are dispersed through rates increases / council debt over time. We expect the proposed changes will significantly devalue our properties given the high cost of implementation and the reduction in farm incomes. We ask that council first and foremost remove PC1's regulatory approach proposed. If this does not occur, then we expect council to provide a range of targeted support mechanisms to recognise the cost of implementation and to compensate for the ongoing loss of potential farm income.
3. **Ability to make meaningful change.** We currently do not have sufficient information to know where water quality is a problem are and therefore how to effectively target our work. While we do not want our activities to create high levels of sediment and e-coli in the streams this plan change is being thrust upon farmers with no real data to show the source of these contaminants (both activity and location) or the natural state in our area. There is only one water quality monitoring site across Mākara and Ohariu's full 15,000 hectares and it only relates to the 8,000 hectare Mākara Stream catchment. We believe that many of our smaller streams located on Terawhiti, have good water quality – yet stringent landuse rules will still apply?! We believe PC1 addresses this lack of local water quality information by bluntly proposing broad rules across multiple catchments instead of seeking to target interventions for the best outcomes. As a result, the proposed regulatory implications are wide-reaching, create huge social and financial cost and risk not achieving the outcomes efficiently. We request GRWC to take a farm-scale and catchment-scale approach, rather than whaitua-wide or across a "Freshwater Management Unit". This will better acknowledge the fact that solutions are best achieved on-farm but that streams cross property boundaries and therefore must be part of a catchment-wide approach.
4. **Criminalising vs empowering the community.** We are concerned that the scale of the PC1 current provisions means many people will be non-compliant within a short timeframe and find themselves faced with prosecution. The transition time between current land use and implementing the proposed changes is very short considering the huge financial implications, farm system change required and land use change required. We ask GWRC to take an approach based less on blanket rules, modelled scenarios and enforcement and more on empowering and partnering with the community. We believe this approach is respectful of people and can deliver the same water quality outcomes.

Please find our additional submission points linked to individual PC1 provisions, attached.

Specific Provisions in PC1

Provision	Support / Oppose / Amend	Decision Sought	Reasons
Methods			
Method M44: Supporting the health of rural waterbodies	Support	We ask GWRC to prioritise this work prior to implementing new rules.	<p>We are pleased to see that a range of financial support options for land retirement are proposed, including rates relief. We would like to see this also include compensation if large-scale land retirement progresses.</p> <p>We are also pleased to see the farm-scale approach promoted here and ask that it is better integrated into PC1’s sediment and erosion control policies and rules.</p>
Method M44: Supporting the health of rural waterbodies	Amend	Include increased GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community-led.	The lack of local water quality monitoring data means GWRC has had to make assumptions based on modelling, which we believe are not fit for purpose. The lack of data also makes it difficult for us to see where the water quality is and therefore what solutions to implement on farm.
Policies			
Policy WH.P21 (e-coli)	Amend	Add “Identification of sources of e-coli specific to individual catchments”.	The source of high e-coli levels in Mākara Stream is unknown and there are several potential sources (livestock, septic tanks, waterfowl). The sources need to be known for each catchment in order for them to be addressed. Some parts of the wider Mākara Stream catchment, and many streams outside the catchment, will likely not have an e-coli issue.
Policy WH.P21 (e-coli)	Amend	Add “Incorporate e-coli reduction in catchment context and farm plans, based on monitored data” – to allow a farm-scale approach as per nitrogen and sediment.	Lack of consistency with WH.P22 (nitrogen) and WH.P23 (sediment). Work to reduce E-coli levels should only target areas where e-coli is shown to be an issue. There is not currently sufficient monitoring data to determine the levels and sources of e-coli across the multiple catchments. It is inappropriate to extrapolate the results of one monitoring site across all of Mākara and Ohariu,

			<p>given the differences in catchments/sub-catchment.</p> <p>Local water quality studies need to be carried out and the option for landowner farm-scale monitoring provided for – including feedback loops to monitor the impact of actions.</p>
<p>Policy WH.P23 (a) (sediment – identifying high risk land)</p>	<p>Amend</p>	<p>Identify sediment sources by using a farm-scale assessment of sediment sources rather than the erosion-risk mapping in PC1.</p> <p>Refocus this section on identifying “sediment sources” rather than erosion risk land/pasture.</p>	<p>The PC1 mapping does not correspond well with ground-truthed information on erosion from landowners who have worked with the land for multiple generations. Concerned about both the accuracy of the modelled scenarios and that it might not include accurate analysis of soil types. The modelling is coarse and is not fit for purpose in Mākara/Ohariu.</p> <p>This policy includes generic assumptions on the source of sediment. Concerned that the policy focuses on hill country erosion as a source of sediment and not streambank erosion in high flow events – anecdotally a much higher contributor to sediment loss. We do support revegetation of vulnerable areas of farms in order to reduce flood flows and streambank erosion – but there are multiple options for revegetation sites that best work within the farm system.</p> <p>The area forced into retirement will be much bigger than the red areas mapped due to the need to aggregate areas and work with the landscape to locate sensible fencelines.</p> <p>Allow for a much more accurate assessment of <u>risk</u> on individual farms by assessment of sediment sources at the farm-scale.</p>
<p>Policy WH.P23 (b)</p>	<p>Amend</p>	<p>Refocus from “erosion risk” to</p>	<p>As per above, the sources of sediment are likely broader than</p>

(Sediment – Erosion Risk Mgt Plans)		“sediment management”.	erosion on hillsides. This will help also acknowledge other existing sediment management techniques such as low stocking rates and good pasture cover.
Policy WH.P23 (c) (Sediment – requirement for revegetation)	Oppose	Remove this blanket approach and instead rely on the bespoke actions and timeframes that will be identified through farm-scale assessment, including via the audited Freshwater Farm Plans.	<p>This provision will financially cripple many farms given the large area, timeframes and requirement to retire the land. The removal of vegetation from this landscape occurred many generations ago yet the revegetation is required to be implemented by current owners within a short timeframe.</p> <p>The “woody vegetation” will likely need to be natural reversion since using poplars and willows (alongside grazing) is unlikely to be successful on these steepest areas given the high-wind nature of our landscape - and based on people’s own trial work to date. Therefore fencing and retirement will be the only tool available.</p> <p>This area has unique challenges with revegetation projects, in large part due to the high winds. Native planting will not be affordable on this scale and natural reversion in the top of this landscape will take a very long time to establish, including a significant period through gorse, creating a seed source within farms. The provision’s requirement to “maintain” the woody vegetation will be unviable, given the large-scale land retirement and reduced farm income from less productive land and high fencing costs incurred. Another challenge to revegetation projects is working alongside Meridian’s wind farms (crossing six of our farms) where afforestation needs to be designed to not impede wind flow.</p> <p>The policy relies on modelling that we believe is inaccurate. It</p>

			makes no sense to retire farmland where there is no actual erosion issue.
Policy WH.P26 (Livestock access to small rivers)	Amend	<p>Replace “restrict” with “reduce through non-regulatory means”.</p> <p>Amend the policy wording to match the heading about river size.</p>	<p>Make consistent with the associated Rule regarding reduced access where practical rather than restricted access.</p> <p>While we support revegetating streams in theory the sheer number of small streams on our extremely hilly landscape, the crippling costs and the complete impracticality of fencing large swathes of land, particularly when we have numerous intersecting gullies that are flood zones, we cannot support this blanket rule.</p> <p>Farm-scale analysis of risk and solutions is critical – rather than blanket restrictions. There is a risk to increased animal welfare issues if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach needs to be supported to help deliver solutions such as sediment retention / stockwater ponds.</p>
Policy WH.P27 (Promoting stream shading)	Amend	Amend to “where economically practical to do so”	We recognise the value of riparian planting of natives and poplar/willows for shade where practicable. Terawhiti has already been actively planting poplars to help streambank stabilisation. Despite the time and costs involved to date, these actions have not been 100% successful due to the climate and wind conditions on the property.
Rules			
Rule WH.R27 (Farming activities on 20+ ha)	Amend	Ensure that the details of this rule are consistent with the content and timing for Freshwater Farm Plans	We do not want to double up on farm plan work when an existing process is already in play under national regulation.

Rule WH.R28 and R29 (Access to small river)	Oppose	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.	Also refer to comments against Policy WH.P26.
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View Submitter Details

Submitter No.	S224
Submitter Name	Terawhiti Farming Co Ltd
Online submitter	Yes
Raw submission lodged	Yes

Raw submission points

These are submission points that were lodged as part of an online submission. They have not been summarised.

Raw sub point number	Provision	Support/oppose	Decision sought	Reasons
S224.1	Method M44: Supporting the health of rural waterbodies.	Support	We ask GWRC to prioritise this work prior to implementing new rules.	<p>We are pleased to see that a range of financial support options for land retirement are proposed, including rates relief. We would like to see this also include compensation if large-scale land retirement progresses.</p> <p>We are also pleased to see the farm-scale approach promoted here and ask that it is better integrated into PC1's sediment and erosion control policies and rules.</p>
S224.2	Method M44: Supporting the health of rural waterbodies.	Amend	Include increased GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community-led.	The lack of local water quality monitoring data means GWRC has had to make assumptions based on modelling, which we believe are not fit for purpose. The lack of data also makes it difficult for us to see where the water quality is and therefore what solutions to implement on farm.
S224.3	Policy P121: Core allocation for rivers.	Amend	Add "Identification of sources of e-coli specific to individual catchments".	The source of high e-coli levels in Mākara Stream is unknown and there are several potential sources (livestock, septic tanks, waterfowl). The sources need to be known for each catchment in order for them to be addressed. Some parts of the wider Mākara Stream catchment, and many streams outside the catchment, will likely not have an e-coli issue.
S224.4	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Add "Incorporate e-coli reduction in catchment context and farm plans, based on monitored data" – to allow a farm-scale approach as per nitrogen and sediment.	<p>Lack of consistency with WH.P22 (nitrogen) and WH.P23 (sediment).</p> <p>Work to reduce E-coli levels should only target areas where e-coli is shown to be an issue. There is not currently sufficient monitoring data to determine the levels and sources of e-coli across the multiple catchments. It is inappropriate to extrapolate the results of one monitoring site across all of Mākara and Ohariu, given the differences in catchments/sub-catchment.</p> <p>Local water quality studies need to be carried out and the option for landowner farm-scale monitoring provided for – including feedback loops to monitor the impact of actions.</p>
S224.5	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	<p>Identify sediment sources by using a farm-scale assessment of sediment sources rather than the erosion-risk mapping in PC1.</p> <p>Refocus this section on identifying "sediment sources" rather than erosion risk land/pasture.</p>	<p>The PC1 mapping does not correspond well with ground-truthed information on erosion from landowners who have worked with the land for multiple generations. Concerned about both the accuracy of the modelled scenarios and that it might not include accurate analysis of soil types. The modelling is coarse and is not fit for purpose in Mākara/Ohariu.</p> <p>This policy includes generic assumptions on the source of sediment. Concerned that the policy focuses on hill country erosion as a source of sediment and not streambank erosion in high flow events – anecdotally a much higher contributor to sediment loss. We do support revegetation of vulnerable areas of farms in order to reduce flood flows and streambank erosion – but there are multiple options for revegetation sites that best work within the farm system.</p> <p>The area forced into retirement will be much bigger than the red areas mapped due to the need to aggregate areas and work with the landscape to locate sensible fencelines.</p> <p>Allow for a much more accurate assessment of risk on individual farms by assessment of sediment sources at the farm-scale.</p>
S224.6	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Refocus from "erosion risk" to "sediment management".	As per above, the sources of sediment are likely broader than erosion on hillsides. This will help also acknowledge other existing sediment management techniques such as low stocking rates and good pasture cover.
S224.7	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Remove this blanket approach and instead rely on the bespoke actions and timeframes that will be identified through farm-scale assessment, including via the audited Freshwater Farm Plans.	<p>This provision will financially cripple many farms given the large area, timeframes and requirement to retire the land. The removal of vegetation from this landscape occurred many generations ago yet the revegetation is required to be implemented by current owners within a short timeframe.</p> <p>The "woody vegetation" will likely need to be natural reversion since using poplars and willows (alongside grazing) is unlikely to be successful on these steepest areas given the high-wind nature of our landscape - and based on people's own trial work to date. Therefore fencing and retirement will be the only tool available.</p> <p>This area has unique challenges with revegetation projects, in large part due to the high winds. Native planting will not be affordable on this scale and natural reversion in the top of this landscape will take a very long time to establish, including a significant period through gorse, creating a seed source within farms. The provision's requirement to "maintain" the woody vegetation will be unviable, given the large-scale land retirement and reduced farm income from less productive land and high fencing costs incurred. Another challenge to revegetation projects is working alongside Meridian's wind farms (crossing six of our farms) where afforestation needs to be designed to not impede wind flow.</p> <p>The policy relies on modelling that we believe is inaccurate. It makes no sense to retire farmland where there is no actual erosion issue.</p>
S224.8	Policy WH.P26: Managing livestock access to small rivers.	Amend	<p>Replace "restrict" with "reduce through non-regulatory means".</p> <p>Amend the policy wording to match the heading about river size.</p>	<p>Make consistent with the associated Rule regarding reduced access where practical rather than restricted access.</p> <p>While we support revegetating streams in theory the sheer number of small streams on our extremely hilly landscape, the crippling costs and the complete intractability of fencing large swathes of land, particularly when we have numerous intersecting gullies that are flood zones, we cannot support this blanket rule.</p> <p>Farm-scale analysis of risk and solutions is critical – rather than blanket restrictions. There is a risk to increased animal welfare issues if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach needs to be supported to help deliver solutions such as sediment retention / stockwater ponds.</p>
S224.9	Policy WH.P27: Promoting stream shading.	Amend	Amend to "where economically practical to do so"	We recognise the value of riparian planting of natives and poplar/willows for shade where practical. Terawhiti has already been actively planting poplars to help streambank stabilisation. Despite the time and costs involved to date, these actions have not been 100% successful due to the climate and wind conditions on the property.
S224.10	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	Amend	Ensure that the details of this rule are consistent with the content and timing for Freshwater Farm Plans	We do not want to double up on farm plan work when an existing process is already in play under national regulation.
S224.11	Rule WH.R28: Livestock access to a small river – permitted activity.	Oppose	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.	Also refer to comments against Policy WH.P26.

Raw submission documents

These are files that were uploaded as part of an online submission.

Document name	File	Description	Upload date
TFC	pc1submissiontfc.pdf		15/12/2023 15:28